

Texas Real ID Full Compliance Checklist

#	Section	Does the State	Yes, is met	Comments
1	§ 37.11(a)	Subject each applicant to a mandatory facial image capture and retain such image even if a driver license (DL) or identification card (ID) is not issued	✓	
2	§ 37.11(b)	Have each applicant sign a declaration under penalty of perjury that the information presented is true and correct, and the State must retain this declaration	✓	
3	§ 37.11(c) (1)	Require an individual to present at least one of the source documents listed in subsections (i) through (x) when establishing identity	✓	
4	§ 37.11(d)-(g)	Require documentation of: <ul style="list-style-type: none"> • Date of birth • Social Security Number • Address of principal residence • Evidence of lawful status 	Partial	Texas currently requires documentation of Date of Birth, Social Security Number, Address of principal residence, and lawful presence. Legislation is required to collect SSN for identification cards.
5	§ 37.11(h)	Have a documented exceptions process that meets the requirements established in 37.11(h)(1)-(3)(If States choose to have such a process)	✓	
6	§ 37.13	Make reasonable efforts to ensure that the applicant does not have more than one DL or ID already issued by that State under a different identity	✓	
7	§ 37.13(b)(1)	Verify lawful status through SAVE or another method approved by DHS	✓	

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8	§ 37.13(b)(2)	Verify Social Security account numbers with the Social Security Administration or another method approved by DHS	Partial	Collection of social security numbers for identification applicants requires legislative approval.
9	§ 37.15(b)	Issue DL and IDs that contain Level 1, 2 and 3 integrated security features	√	
10	§37.17(a)-(l)	<p>Surface of cards include the following printed information in Latin alpha-numeric characters:</p> <ul style="list-style-type: none"> • Full legal name * • Date of birth • Gender • Unique DL/ID number • Full facial digital photograph ** • Address of principal residence [with exceptions] • Signature [with exceptions] • Date of transaction • Expiration date • State or territory of issuance <p>NOTE: H – Physical security features & I – Machine-readable technology are not included in the bulleted list above nor are they included under the Full Compliance Checklist.</p>	√	
11	§ 37.17 (n)	<p>Commit to marking fully compliant DL and IDs with a DHS-approved security marking</p> <p>NOT REQUIRED FOR MATERIAL COMPLIANCE</p>		Marking both compliant and non-compliant DL and IDs require legislative approval.
12	§ 37.21	Issue temporary or limited-term licenses to all individuals with temporary lawful status and <u>tie license validity to the end of lawful status</u>	√	

#	Section	Does the State	Yes, is met	Comments
13	§ 37.41	Have a documented security plan for DMV operations in accordance with the requirements set forth in § 37.41		Texas will conduct an evaluation of current security processes for documentation in accordance to §37.41
14	§ 37.41(b)(2)	Have protections in place to ensure the security of personally identifiable information	Partial	Security Cameras have been installed in 63 of 201 driver license office locations.
15	§ 37.41 (b) (5) (i)-(ii)	Require all employees handling source documents or issuing DL or IDs to attend and complete the AAMVA approved (or equivalent) fraudulent document recognition training and security awareness training	✓	
16	§ 37.45	Conduct name-based and fingerprint-based criminal history and employment eligibility checks on employees in covered positions or an alternative procedure approved by DHS	✓	
17	§ 37.51 (b)	Commit to be in full compliance with Subparts A through D on or before May 11, 2011 NOT REQUIRED FOR MATERIAL COMPLIANCE		
18	§37.71(a)(1)	Clearly state on the face of non-compliant DLs or IDs that the card is not acceptable for official purposes, except for licenses renewed or reissued under § 37.27 NOT REQUIRED FOR MATERIAL COMPLIANCE		Marking both compliant and non-compliant DL and IDs require legislative approval.
19	§ 37.05(a)	Issue REAL ID DL/ID cards valid for a period not to exceed eight years		Legislation required to repeal "indefinite" expiration date on compliant ID cards issued to individuals 60 YOA or older.
20	§ 37.11(i)	Take sufficient steps in issuing REAL ID DL/ID cards to safeguard the identities of persons identified in section 37.11(i)	✓	
21	§ 37.13(b)(3)	Verify birth certificates		Texas does not currently participate in EVVE.

#	Section	Does the State	Yes, is met	Comments
22	§ 37.13(b)	Verify a U.S. passport, Consular Report of Birth Abroad, and U.S. Visa with accompanying valid I-94	✓	
23	§ 37.13(b)(5)	Verify REAL ID driver's licenses and identification cards with the State of issuance		The Driver Identification Verification system has not been developed for states utilization. Legislation is required to provide social security numbers to state driver licensing agencies for verification purposes of driver licenses/identification cards.
24	§ 37.15(a)(1)	Include document security features on REAL ID DL/ID cards that are not capable of being reproduced using technologies that are commonly used and made available to the general public.	✓	
25	§ 37.15(d)	Conduct a review and submit a report to DHS on card design and the ability of the card to resist forgery and counterfeiting		Texas will conduct a review for purposes of submitting a report to DHS on card design and the ability to resist forgery and counterfeiting.
26	§ 37.19 (a)-(j) § 37.21(e)	Include all of the information on the face of the card in the PDF-417 Machine Readable Zone of the card and, in addition, the: <ul style="list-style-type: none"> • Card design revision date • Inventory control number • Indication that license is temporary or limited-term 		Federal Grant funding has been made available to implement this benchmark. Legislation is required to mark cards compliant/non-compliant which must be included within this information. Programming is pending.
27	§ 37.21	Prior to renewing temporary or limited-term driver's license or identification cards, require applicants to: <ul style="list-style-type: none"> • Present valid documentary evidence that their qualification is still in effect or that they have qualified for another lawful status; and • Verify information presented through SAVE, or another method approved by DHS 	✓	
28	§ 37.23(a)	Have a procedure in place to verify an applicant's identity each time a REAL ID DL/ID card is reissued.	✓	
29	§ 37.23(b)	Conduct remote re-issuance, if permitted, in accordance with section 37.13 verification procedures (excluding re-issuance of duplicate cards).	✓	
30	§ 37.23(c)	Require in person re-issuance when there is any material change in personally identifiable information since prior issuance, as defined in § 37.03. Such information shall be verified as specified in 37.13	✓	

#	Section	Does the State	Yes, is met	Comments
31	§37.25(a)(1)-(3)	<p>Prior to renewing a REAL ID DL/ID:</p> <ul style="list-style-type: none"> Take an updated photograph of all holder's of REAL ID drivers license and identification cards no less frequently than every sixteen years Re-verify applicant's SSN and lawful status, as well as information it was unable to verify at previous issuances or renewals because systems or processes did not exist. 	Partial	<p>Texas collects an updated photograph on all DL/ID holders no less than 12 years with the exception of ID cards issued to 60 YOA or older.</p> <p>Legislation required to repeal "indefinite" expiration date on compliant ID cards issued to individuals 60 YOA or older.</p> <p>Collection of social security numbers for identification applicants requires legislative approval.</p>
32	§37.25(b)(1)-(2)	<p>If remote REAL ID renewals are permitted:</p> <ul style="list-style-type: none"> Re-verify the applicants information through SAVE and SSOLV (or other methods approved by DHS) Prohibit the remote renewal of REAL ID DL/ID when there is a material change in personally identifiable information, as defined in §37.03. 	√	Texas does not currently provide this service.
33	§ 37.29	<p>Not permit an individual to hold more than one REAL ID document, and no more than one DL</p> <ul style="list-style-type: none"> Prior to issuing a REAL ID driver's license, query other States to determine if applicant has been already been issued a driver's license or REAL ID identification card; Confirm that the other card has been, or is being, terminated Prior to issuing a REAL ID identification card, query other States to determine if applicant has already been issued a REAL ID DL/ID; Confirm that the other card has been, or is being, terminated 	Partial	<p>Texas currently complies with the requirement to prohibit possession of no more than one DL. Legislation is required to prohibit the issuance of more than one compliant card.</p> <p>The Driver Identification Verification system has not been developed for states utilization.</p>
34	§37.31(a)(1)-(3)	Retain copies of the application, declaration and source documents. Paper copies and microfiche must be retained for seven years. Digital images must be retained for a minimum of ten years.	√	
35	§37.31(b)(1)-(3)	<p>If digital imaging is used to retain source documents,</p> <ul style="list-style-type: none"> Store photo images in a JPEG compatible format Store document and signature images that are compressed in Tagged Image Format (TIF) or comparable standard Require that all images are retrievable by the DMV if properly requested by law enforcement 	√	

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36	§ 37.33(a)-(b)	Maintain a DMV database containing, at a minimum, items identified in 37.33(a)(1)-(4)	√	
37	§ 37.41 (b)(4)	Implement documented procedures for controlling access to facilities and systems involved in the enrollment, manufacture, production and issuance of DL/IDs		Texas will conduct an evaluation of current security processes for documentation in accordance to §37.41
38	§ 37.43	Ensure the physical security of locations where driver's licenses and identification cards are manufactured or produced, and the security of document materials and papers of which such cards are produced.	√	
39	§ 37.55	Submit Final Certification package, to include; <ul style="list-style-type: none"> • Full compliance certification checklist • Attorney General letter • Certification by highest level executive official in state overseeing DMV • Description of states exceptions process per §37.11(h), waiver process (per §37.45(b)(1)(v)) • State security plan (per §37.41) 		Texas will submit final certification upon full compliance.